

EFFICACY REVIEW
by Mark Suarez, Entomologist - IB

Mark ES
4 Oct 2004

DATE: 13 September 2004

EPA REG. NUMBER: 62719-453

PRODUCT NAME: Recruit III

SECONDARY REVIEWER: Kevin Sweeney, Senior Entomologist *Kevin Sweeney*

REGISTRANT: Dow Agrosiences LLC

RM: Richard Gebken, Acting RM10
REVIEWER: Joseph Tavano

DECISION #.: 337858
DP BARCODE: 301578

ACTION: R34; Non-Fast Track

ACTIVE INGREDIENT(S): 118204, Noviflumuron

TYPE: Subterranean Termite Bait

OPPTS GUIDELINE(S): 810.1000
810.3000
810.3800

MRID: 46176901

GLP ?: No.

SITES: ORNAMENTAL TREES (BAIT APPLICATION); BUILDINGS (WOOD); WOOD FENCES (SOIL CONTACT NONFUMIGATION TREATMENT); WOOD DECKS (SOIL CONTACT NONFUMIGATION TREATMENT); WOOD UTILITY POLES (SOIL CONTACT NONFUMIGATION TREATMENT); WOOD PRODUCTS (SOIL CONTACT NONFUMIGATION TREATMENT).

PESTS:**SUBTERRANEAN TERMITES;
TERMITES.****APPLICATION RATE:****STUDY SUMMARIES:**

The registrant has submitted a study in support of their position that bimonthly monitoring of bait stations is sufficient for the maintenance of the Sentricon Termite Colony Elimination System. The supporting study contains data on the elimination time of termite activity for sites with bimonthly monitoring (median 119 days) compared to previous data for monthly, adjusted to bimonthly, monitoring of termite activity elimination (median 105 days).

ENTOMOLOGIST'S COMMENTS:

Although there is little support for an increased monitoring interval, the data supporting monthly monitoring is no more robust. The data submitted indicate that significantly decreased efficacy is not likely to occur with an increased inspection interval. Recent modifications to the baiting system coupled with the pharmacokinetics of the active ingredient, Noviflumuron, indicate the increased inspection interval imposes a minor increase in the risk of system failure. The results submitted do not indicate that an increase in time between monitoring from monthly to bimonthly or quarterly would impact significantly the time from initial treatment to colony control.

ENTOMOLOGIST'S RECOMMENDATIONS:

On the basis of the data submitted, the following recommendations are made with regard the registrant's desire to (1) increase the monitoring interval from monthly to "monthly to quarterly" and (2) use baits at locations "where termites, evidence of termite activity or conditions conducive to termite activity are observed" without first using monitoring stations:

- The inspection interval may be increased to monthly to quarterly for both monitoring station that have not shown activity and bait stations where termites are active. The appropriate inspection interval should be left to the PCO on the basis of termite feeding pressure.
- The installation of baits containing active ingredient at locations with pre-existing or probable termite activity without first establishing termite activity through the use of monitoring stations is an acceptable amendment.